IT 1
6/4/01

MEMORANDUM

DATE: June 4, 2001

SUBJECT: Review of Quality Assurance Project Plan for the Removal Action Work Plan, 341 East Ohio Street, Chicago, Illinois, dated May, 1, 2001. FSS QAPP Document Log #2719

FROM: Patricia J. Scott,
Superfund Field Services Section

TO: Verneta Simon, OSC
Superfund Division

CC: Steve Ostrodka, Chief,
Superfund Field Services Section

I have reviewed the Quality Assurance Project Plan for the Removal Action Work Plan, 341 East Ohio Street, Chicago, Illinois, dated May, 1, 2001. My review of the document was limited to the QAPP and FSP since I do not have the technical expertise to review radiation SOPs. Listed below are my comments.

QAPP:

1. The sign off page is missing.

2. The table of Acronyms is missing.

3. The distribution list is missing.

4. Element A-4 Project/Task Organization
   - A. Responsibilities for data validation, data assessment and internal and external performance system audits need to be designated.
   - B. The US EPA Region 5 Superfund Quality Assurance reviewer has the responsibility to review and approve QAPPs. Please add this to the QA responsibilities section.
   - C. The responsibility of identifying and documenting non-comformances needs to be specified in the Field responsibilities section.
   - D. The analysis that will be performed by Severn Trent Laboratories and RSSI need to be specified in the Laboratory responsibilities section.
   - E. A project organizational chart needs to be included in this section.

5. Element A6 - Project/Task Description and Schedule

A. Please label Table 1-1 as Table 1-1.
B. The SOPs for the waste characterization and potential groundwater analysis performed by Severn Trent need to be attached to the document.
C. The Task 6 section should discuss the internal and external quality system reviews (audits) that will be performed during this project. Please resubmit this section to reflect this.

6. Element A7 - Quality Objectives and Criteria for Measurement Data
   A. The data quality objectives need to be discussed in this section. Please refer to the QAPP instructions for guidance.
   B. Accuracy must be defined.

7. Element A9 - Documentation and Records
   A. Section B - Data package format and document control needs to be included in this section.

8. Section B2 - Sampling Methods Requirements
   A. The attached FSP does not include any information on the waste characterization and potential groundwater analysis that will be performed by Severn Trent Laboratories. Sampling for these analysis needs to be discussed, particularly the volatile analysis sampling.

9. Section B3 - Sampling Handling and Custody Requirements
   A. The sample handling requirements need to be detailed in this section, as indicated on page 33 of the QAPP instructions.
   B. Field and laboratory custody procedures must be discussed or referenced in this section. Chain-of-custody SOPs for all laboratories participating in the project need to be attached to the document.

10. Section B4 - Analytical Methods Requirements
    A. Analytical methods requirements for the waste characterization and groundwater analysis must be discussed in this section. Refer to the QAPP instructions for guidance.

11. Section B5 - Quality Control Requirements
    A. Limits for precision need to be specified for the laboratory split samples.

12. Section B8 - Inspection/Acceptance Requirements for Supplies and Consumables. The text indicates that a discussion of this topic is included in the FSP. The FSP does not contain any such information. Please resubmit this section with the required information.

13. Section B10 - Instructions for Data Management
    This section needs to be rewritten to included the requested information specified in the QAPP instructions.

14. Section C1 - Assessment and Response Audits
    A. Please add that the US EPA Region 5 Superfund FSS has the discretion to audit the waste characterization laboratory (Severn Trent) and these audits may or may not be announced.
    B. Rewrite the response action section, limiting the discussion to only QAPP non-conformances. Remove all references concerning equipment and material failures.

15. Section D1 - Data Review, Validation and Verification Requirements
    A. The laboratory data must be validated by an entity separate form the generating laboratory. The person responsible for this data validation must be specified in the project management section.